

# **EXHIBIT I**

**Taylor v. The Kroger Co., et al.**

**Excerpts of the Deposition of Karim Vellani**

**Pages: 48 & 64**

Karim Vellani Volume 1 July 12, 2018

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IN THE STATE COURT OF DEKALB COUNTY  
STATE OF GEORGIA

LAQUAN TREMELL TAYLOR

VS.

THE KROGER CO., WESTERN  
UNION FINANCIAL SERVICES,  
INC., AND NORRED &  
ASSOCIATES, INC.

)  
) CIVIL ACTION FILE

) NO. 15A57407E3

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ORAL DEPOSITION OF

KARIM VELLANI

JULY 12, 2018

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ORAL DEPOSITION OF KARIM VELLANI, produced as a witness at the instance of the PLAINTIFF, and duly sworn, was taken in the above-styled and numbered cause on the 12th of July, 2018, from 9:12 a.m. to 2:31 p.m., before Tamara Vinson, CSR in and for the State of Texas, reported by machine shorthand, at the offices of Regus - Texas, Sugar Land - Town Square, 2245 Texas Drive, Suite 300, Sugar Land, Texas, 77479, pursuant to Section 26 and 30 of the Georgia Civil Practice Act, O.C.G.A. 9-11-26 and 9-11-30 and the provisions stated on the record or attached hereto.

1 A. I didn't write this. I reviewed it, but I  
2 didn't put -- I didn't write it.

3 Q. Did you approve it when the lawyers filed it  
4 on your behalf?

5 A. Yes.

6 Q. Does it adequately contain your only opinion  
7 in this case, that Kroger allegedly met the standard  
8 of care for a commercial retail property owner when it  
9 comes to the provision of security?

10 A. So I believe that all three of those are  
11 contained within that sentence, yes.

12 Q. So you only have one opinion, that Kroger met  
13 the standard of care for commercial retail property  
14 owner when it comes to provision of security and the  
15 other two are sub-elements of it?

16 A. Correct.

17 Q. So when you just gave me your three opinions,  
18 really it's just the opinion was the middle one as we  
19 talked and then the other two you told me were  
20 sub-elements of it?

21 A. If you want to characterize it that way  
22 that's fine. I'm saying that they're -- I'm saying  
23 that all three of those opinions as I said them are  
24 contained within that first sentence.

25 Q. Well, you're required to file a formal Rule

1 and there is going to be -- it's going to be long so  
2 just bear with me.

3 So from the beginning I follow the IAPSC  
4 forensic methodology. That methodology calls for an  
5 assessment of threats at the property, a site review  
6 of the site still exists and a vulnerability  
7 assessment of the facts as it relates to this -- to  
8 this particular case, which means that I was not  
9 looking at the safe inside the store. I was looking  
10 at the issues in the parking lot where the incident  
11 occurred.

12 Secondly, the opinions that I have formed  
13 are based on science, specifically criminology, which  
14 says that lighting is a mixed bag of results.  
15 Those -- of all the security measures available in the  
16 parking lot, lighting had the best chance of  
17 preventing the crime.

18 Secondly, the cameras that were installed are  
19 not designed, and the science shows that crime --  
20 violent crime is not prevented by way of video  
21 surveillance. And you can find that data at  
22 crimesolutions.gov if I have not already provided it  
23 to you.

24 No. 3, I have given you a summary of the nine  
25 studies, and that was provided previously, that the